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COUNSEL FOR THE DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION OF AMERICA and SEA GIRT LLC,	§	CASE NO. 21-30085-hdh11
	§	
DEBTORS¹	§	Jointly Administered

**DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING TO BE HELD ON APRIL 21, 2021**

The National Rifle Association of American and Sea Girt LLC (the "Debtors") may call the following witnesses and introduce the following exhibits in connection with the following pleadings scheduled to be heard on April 21, 2021 at 1:30 p.m. and 2:00 p.m. in the above-captioned proceeding (the "Hearing"):

- a. Motion of Christopher W. Cox (I) To Modify the Automatic Stay to Allow a Trial-Ready Arbitration to Proceed Against the National Rifle Association of America, and (II) For Related Relief [Docket Nos. 63 and 75]

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

- b. Debtors' Motion for Waiver of the Requirements of Section 345(b) [Docket No. 78];
- c. Motion for the Appointment of a Member Committee [Docket No. 416];
- d. Debtors' Application for Entry of an Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021 [Docket No. 447]; and
- e. Motion for Entry of Amended Order Authorizing the Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Programs [Docket No. 550].

I. WITNESSES

1. The Debtor reserves the right to call the following individual as witnesses at the Hearing:

- a. John Frazer
- b. David Warren
- c. Robert H. Cox
- d. Charles Cotton
- e. Sonya Rowling
- f. Any witness(es) identified or called by any other parties; and
- g. Rebuttal witnesses, as necessary.

II. EXHIBITS

2. The Debtors reserve the right to introduce the following document as an exhibit at the Hearing:

EXHIBIT NO.	DESCRIPTION
1	Declaration of Svetlana M. Eisenberg in Support of Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay [Docket No. 121]

2	Exhibit 1 (Filed Under Seal) to Declaration of Svetlana M. Eisenberg in Support of Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay [Docket No. 121]
3	Exhibit 2 (Filed Under Seal) to Declaration of Svetlana M. Eisenberg in Support of Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay [Docket No. 121]
4	Exhibit 3 (Filed Under Seal) to Declaration of Svetlana M. Eisenberg in Support of Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay [Docket No. 121]
5	Exhibit 4 (Filed Under Seal) to Declaration of Svetlana M. Eisenberg in Support of Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay [Docket No. 121]
6	Exhibit 5 (Filed Under Seal) to Declaration of Svetlana M. Eisenberg in Support of Debtors' Opposition to Motion of Christopher W. Cox to Modify the Automatic Stay [Docket No. 121]
7	Declaration of Robert H. Cox in Support of Debtors' Application for Entry of an Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021 [Docket No. 447-2]
8	Declaration of Charles Cotton in Support of Debtors' Application for Entry of an Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021 [Docket No. 447-3]
9	Declaration of John C. Frazer in Support of Debtors' Application for Entry of an Order Pursuant to Section 327(e) of the Bankruptcy Code Authorizing the Retention and Employment of Briglia Hundley, P.C. as Special Litigation Counsel for the Debtors and Debtors in Possession Effective as of January 15, 2021 [Docket No. 447-4]

10	Order Authorizing the Debtors to Honor Prepetition Obligations Related to Customer, Donor, and Member Proposals [Docket No. 245]
	Any exhibit(s) offered or introduce by any other parties
	Rebuttal exhibits, as necessary

3. The Debtors reserve the right to supplement this Witness and Exhibit List.

Dated: April 7, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 7th day of April 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ John D. Gaither

John D. Gaither